

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

Pennsylvania Voters Alliance, Stephanie Borowicz, Kristine Eng, Theodore A. Dannerth, Eric Kroner, Eric Nelson, Daryl Metcalfe, Dawn Wetzel Keefer, Russ Diamond, Chris Dush, Jim Gregory, Francis Ryan, Michael Harvey, David Torres, Dasha Pruett,

Civil Action No.:
4:20-CV-01761-MWB
Hon. Matthew W. Brann

Plaintiffs,

**Motion for Temporary
Restraining Order against Kathy
Boockvar, in her official capacity
as Secretary of the
Commonwealth of Pennsylvania**

Centre County, Delaware County, and the City of Philadelphia, and Kathy Boockvar, in her official capacity as Secretary of the Commonwealth of Pennsylvania,

Defendant.

Plaintiffs Pennsylvania Voters Alliance, Stephanie Borowicz, Kristine Eng, Theodore A. Dannerth, Eric Kroner, Eric Nelson, Daryl Metcalfe, Dawn Wetzel Keefer, Russ Diamond, Chris Dush, Jim Gregory, Francis Ryan, Michael Harvey, David Torres, Dasha Pruett, by and through undersigned counsel, hereby move this Court to issue a temporary restraining order enjoining the Centre County, Delaware County, the City of Philadelphia and Cathy Boockvar, in her official capacity as Secretary of the Commonwealth of Pennsylvania, from accepting or using CTCL's private federal election grant and other similar private federal election grants.

The motion for temporary restraining order is supported by the Plaintiffs' memorandum of law filed in support of their motion, a Supplemental

a declaration and attached exhibits, and arguments of counsel. Plaintiffs' original Motion for Temporary Restraining Order filed on September 28, 2020 at Document 4 in this case, together with the supporting documents, is incorporated as if set forth at length herein.

Dated: October 15, 2020

/s/ Thomas W. King, III
Thomas W. King, III, PA ID 21580
Thomas E. Breth, PA ID 66350
Ronald T. Elliott, PA ID 71567
Jordan P. Shuber, PA ID 317823
Special Counsel for the Amistad Project
of the Thomas More Society
Dillon McCandless King Coulter &
Graham, LLP
128 West Cunningham Street
Butler, PA 16001
Telephone: (724) 283-2200
Facsimile: (724) 283-2298
E-mail addresses: tking@dmkcg.com
tbreth@dmkcg.com
relliott@dmkcg.com
jshuber@dmkcg.com
Co-Counsel for Plaintiffs

/s/ Erick G. Kaardal
Erick G. Kaardal, Wis. No. 1035141*
Special Counsel for the Amistad Project
of the Thomas More Society
Gregory M. Erickson, 1050298
William F. Mohrman, 168816
Mohrman, Kaardal & Erickson, P.A.
150 South Fifth Street, Suite 3100
Minneapolis, Minnesota 55402
Telephone: 612-341-1074
Facsimile: 612-341-1076
Email: kaardal@mklaw.com
Co-Counsel for Plaintiffs

**Specially Admitted Pro Hac Vice in
Pennsylvania*